

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE

ROBERT and TANYA WILLIAMS, et al.,  
Plaintiff  
v.  
UNITED STATES OF AMERICA  
Defendant.

CASE NO. 2:18-cv-01837-RSM

JOINT STIPULATED MOTION FOR  
EXTENSION OF PRETRIAL  
DEADLINES

**Noted on Motion Calendar:  
December 7, 2020**

**JOINT STIPULATION**

The parties hereby jointly STIPULATE AND AGREE to extend the following pretrial deadlines as set forth in the Court's March 11, 2020, Order Setting Trial Date and Related Dates (Dkt. No. 30), as set forth below.

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<b><u>Deadline</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed New Deadline</u></b>
Deadline for filing motions related to discovery	December 11, 2020	March 1, 2021
Expert Rebuttal Reports	December 11, 2020 (per FRCP)	March 1, 2021
Discovery completed by	January 11, 2021	March 22, 2021
All dispositive motions must be filed by and noted on the motion calendar no later than the fourth Friday thereafter (see LCR 7(d))	February 9, 2021	March 22, 2021
All motions in limine must be filed by and noted on the motion calendar no later than the THIRD Friday thereafter	April 12, 2021	April 21, 2021
Agreed pretrial order due		
Trial briefs and proposed findings of fact and conclusions of law, designations of deposition testimony pursuant to LCR 32(e), and trial exhibits due		

Good cause exists for extending these deadlines. Although the parties have conducted extensive fact discovery to date, and expert disclosures have also been completed, the parties would like to focus their time and resources on preparing for a mediation that is scheduled for mid-February. The parties hope that in allowing more time to complete discovery, they can preserve the costs of expert depositions and any remaining fact discovery prior to the mediation. If a mediation is unsuccessful, this extension will allow the parties to then complete expert and any remaining fact discovery after the mediation. Extension of the deadlines referenced above will not impact the remaining deadlines set forth in the Court's March 11, 2020, Order, and listed below for the Court's convenience.

<u><b>Deadline</b></u>	<u><b>Current Deadline</b></u>	<u><b>Proposed New Deadline</b></u>
SIX DAY BENCH TRIAL	May 10, 2021	N/A
Mediation per LCR 39.1(c)(3), <b>if requested by the parties,</b> held no later than	March 26, 2021	N/A
Agreed pretrial order due	April 28, 2021	N/A
Pretrial conference to be scheduled by the Court.		
Trial briefs and proposed findings of fact and conclusions of law, designations of deposition testimony pursuant to LCR 32(e), and trial exhibits due	May 5, 2021	N/A

For the reasons set forth above, the parties believe that there is good cause to request an extension of the above-listed pretrial deadlines and respectfully request that the Court grant their motion.

**SO STIPULATED.**

Dated this 7th day of December, 2020.

s/ Patrick J. Sullivan

Patrick J. Sullivan, WSBA #50230

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JOINT STIPULATED MOTION FOR  
EXTENSION OF PRETRIAL DEADLINES  
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5 Attorneys for Plaintiffs

6 **SO STIPULATED.**

7 Dated this 7th day of December, 2020.

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9 United States Attorney

10 s/ Kristen R. Vogel

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**ORDER**

**IT IS SO ORDERED.**

Dated this 9<sup>th</sup> day of December, 2020.



**RICARDO S. MARTINEZ**  
**CHIEF UNITED STATES DISTRICT JUDGE**